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July 11, 2023

VIA EMAIL

Honorable Lisa G. Beckerman  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Rm. 623  
New York, NY 10004-1408

Re: Erbo Properties LLC et al (the “Debtors”)  
Case No. 23-10210

Dear Judge Beckerman:

I write in connection with the application (the “Application”) of the three procedurally consolidated debtors [ECF#114] to retain my law firm as substitute general bankruptcy counsel and the request received from chambers to provide proposed orders for the Application and the application to retain special counsel [ECF #115] which was filed by me in my capacity as proposed substitute counsel.

At the time the Application was submitted, the Debtors were under control of the same management. Since then this Court has entered an order authorizing 541 W 21 SME LLC to take control of the equity interests of two of the Debtors and appoint separate management for them. I believe it would be inappropriate for my firm to represent all three debtors and I am accordingly withdrawing my firm’s willingness to accept the representation which was sought in the Application.

Under the circumstances it would also be inappropriate for me to submit a proposed order with respect to special counsel.

Sincerely,

/s/Isaac Nutovic  
Isaac Nutovic

cc: Scott Markowitz  
Morris Bauer  
Stephen Selbst  
Tara Tiantian

